

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 **IN RE GOOGLE PLAY STORE**
12 **ANTITRUST LITIGATION**

13 THIS DOCUMENT RELATES TO:

14 *Epic Games Inc. v. Google LLC et al.*,
Case No. 3:20-cv-05671-JD

15 *In re Google Play Consumer Antitrust*
Litigation, Case No. 3:20-cv-05761-JD

16 *State of Utah et al. v. Google LLC et al.*,
Case No. 3:21-cv-05227-JD
17
18
19
20
21
22
23
24
25
26
27
28

CASE No. 3:21-md-02981-JD

DECLARATION OF LEE M. MASON
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SANCTIONS

Judge: Hon. James Donato

MASON DECLARATION IN SUPPORT OF PLAINTIFFS'
MOTION FOR SANCTIONS

Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:21-cv-05227-JD

1 I, Lee M. Mason, declare as follows:

2 1. I am an attorney duly admitted to practice in the State of Illinois and before
3 this Court *pro hac vice*. I am an associate at Bartlit Beck LLP, and represent the proposed
4 consumer class in this action. I submit this declaration in support of the Plaintiffs' Notice of
5 Motion and Motion for Sanctions, and Memorandum of Points and Authorities in Support
6 Thereof. The contents of this declaration are based on my personal knowledge, including my
7 personal knowledge of the documents cited herein. The facts set forth herein are within my
8 personal knowledge and if called as a witness, I could and would competently testify to them.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of the letter dated
10 November 11, 2021 from Brian Rocca to Lauren Moskowitz.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of Defendants
12 Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Asia Pacific Pte. Ltd.,
13 and Google Payment Corp.'s Responses and Objections to Plaintiffs' Document Preservation
14 Interrogatories, dated January 14, 2022.

15 4. Attached hereto as **Exhibit 3** is an excerpt of a true and correct copy of
16 the deposition transcript of Jamie Rosenberg, taken in this litigation on February 10, 2022.

17 5. Attached hereto as **Exhibit 4** is an excerpt of a true and correct copy of
18 the deposition transcript of Tian Lim, taken in this litigation on December 2, 2021.

19 6. Attached hereto as **Exhibit 5** is an excerpt of a true and correct copy of
20 the deposition transcript of Michael Marchak, taken in this litigation on January 12, 2022.

21 7. Attached hereto as **Exhibit 6** is an excerpt of a true and correct copy of
22 the deposition transcript of Justin Mattson, taken in this litigation on July 29, 2022.

23 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document
24 produced by Google in this litigation bearing the Bates range GOOG-PLAY-005576717 to
25 GOOG-PLAY-005576718.

26
27
28 MASON DECLARATION IN SUPPORT OF PLAINTIFFS'
MOTION FOR SANCTIONS

Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:21-cv-05227-JD

1 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document
2 produced by Google in this litigation bearing the Bates range GOOG-PLAY-010510806 to
3 GOOG-PLAY-010510807.

4 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document
5 produced by Google in this litigation bearing the Bates stamp GOOG-PLAY-003930716.

6 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document
7 produced by Google in this litigation bearing the Bates range GOOG-PLAY-007213451 to
8 GOOG-PLAY-007213458.

9 12. Attached hereto as **Exhibit 11** is an excerpt of a true and correct copy of
10 the deposition transcript of Ashish Pimplapure, taken in this litigation on March 23, 2022.

11 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document
12 produced by Google in this litigation bearing the Bates range GOOG-PLAY-005601967 to
13 GOOG-PLAY-005601970.

14 14. Attached hereto as **Exhibit 13** is a true and correct copy of a document
15 produced by Google in this litigation bearing the Bates range GOOG-PLAY-007611604 to
16 GOOG-PLAY-007611606.

17 15. Attached hereto as **Exhibit 14** is a true and correct copy of a document
18 produced by Google in this litigation bearing the Bates stamp GOOG-PLAY-000353866.

19 16. Attached hereto as **Exhibit 15** is a true and correct copy of a document
20 produced by Google in this litigation bearing the Bates range GOOG-PLAY-007873896 to
21 GOOG-PLAY-007873900.

22 17. Attached hereto as **Exhibit 16** is a true and correct copy of a document
23 produced by Google in this litigation bearing the Bates range GOOG-PLAY-003929257 to
24 GOOG-PLAY-003929258.

25 18. Attached hereto as **Exhibit 17** is a true and correct copy of a document
26 produced by Google in this litigation bearing the Bates stamp GOOG-PLAY-010510815.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a document produced by Google in this litigation bearing the Bates range GOOG-PLAY-002384214 to GOOG-PLAY-002384215.

22. Attached hereto as **Exhibit 21** is a true and correct copy of a document produced by Google in this litigation bearing the Bates range GOOG-PLAY-003600814 to GOOG-PLAY-003600816.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 13th day of October, 2022 at Chicago, Illinois.

/s/ Lee M. Mason